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GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
MICHIGAN OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
MARTHA B. YODER  
DIRECTOR

MIKE ZIMMER  
ACTING DIRECTOR

MIOSHA GENERAL INDUSTRY SAFETY STANDARD  
PART 62 PLASTIC MOLDING  
ADVISORY COMMITTEE MEETING

August 18, 2014 – 9:00 a.m.  
State Secondary Complex, 7150 Harris Drive, Lansing, Michigan, 48909  
General Office Building, Conference Room B

**MEETING MINUTES**

**ADVISORY COMMITTEE MEMBERS PRESENT:**

Bradley Lawrence .....Hi-Tech Mold & Engineering  
Andrew Comai .....UAW  
Mark Stratton .....Lacks Enterprises, Inc  
William “Lonny” Sumpter.....Inergy Automotive  
Gary Kaminski .....Cascade Engineering  
Timothy Koury.....Blue Water Safety Consultants

**MIOSHA STAFF PRESENT:**

Martha Yoder .....MIOSHA Director  
Bart Pickelman .....MIOSHA Deputy Director  
Ron Ray .....MIOSHA Technical Services Division Director  
Dan Dykstra .....Regulatory Services Section Program Manager  
Adrian Rocskay.....General Industry Safety & Health Division Director  
Jeff Kelley .....Consultation Education & Training Division Safety Consultant  
Toscha Densmore.....Regulatory Services Section Secretary

**Call to Order**

The August 18, 2014 General Industry Safety Standard Part 62 Plastic Molding, (GI Part 62), advisory committee meeting was called to order by Regulatory Services Section Manager Dan Dykstra at 9:10am. A quorum of advisory committee members was present.

Introductions of the MIOSHA staff were made.

**Review of March 17, 2014 Meeting Minutes**

The Advisory Committee members were given a few minutes to review the minutes and provide any input they may have. Mr. Lonny Sumpter inquired on where the amount of \$200 to rewire a machine came from. Dr. Adrian Rocskay stated this was an amount that was provided to him during a discussion with an OSHA representative. Mr. Jeff Kelley stated he did some research into the cost and found an article that pointed out the actual

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cost could not be provided as it would vary depending on the age of the machine as well as the tonnage, but it was estimated anywhere from \$4000-\$15,000. After brief discussion, a motion was made by Mr. Timothy Koury and seconded by Mr. Gary Kaminski to approve the March 17, 2014 meeting minutes. **MOTION CARRIED UNANIMOUSLY.**

#### **Review of Issue – Bart Pickelman**

MIOSHA Deputy Director Bart Pickelman welcomed the advisory committee members and thanked them for assisting with the committee.

Mr. Pickelman provided some background on the GI Part 62 standard. Due to technological advances in the industry that provide for separate energy isolating devices allowing power to be maintained to the heating elements and the computer controls while locking out the power to other equipment that exposed employees to a hazard, OSHA has requested that MIOSHA conduct a review of the alternate procedures of GI Part 62 to ensure they are up to date with the knowledge and understanding of most current industry practices in guarding methods. After the advisory committee meeting in March, MIOSHA has used the input provided and conducted additional research to come up with some language to phase out the current procedure.

Dr. Rocskay had a discussion with the Society of the Plastics Industry (SPI) on April 23, 2014, via a teleconference, with 8 representatives from the SPI. The SPI recommended that MIOSHA adopt the current ANSI Standard and agreed that phasing out our rule is a great plan. The SPI believes everyone should be complying with the 2007 ANSI standard, B151.1. As far as estimating costs to retrofit machines, the SPI could not give any estimates as they are not experts in the field of updating machinery, plus it would vary depending on the size of each machine. Mr. Koury stated he believes what MIOSHA did in 2000 to our standard pushed both ANSI and the SPI to look at their rules. Mr. Kelley went over a few of the changes that were made in the ANSI B151.1 standard since 1974 in regards to guarding, interlocks, and safety devices.

#### **Review Proposed Draft**

The proposed draft has modified R 408.16234 by adding a new (10) and modifying the current (10) to become (11). The proposed language, would give approximately two (2) years to phase out the current procedure. Mr. Dykstra provided a brief overview of the promulgation process to provide an idea of how long it is anticipated for the rule change to go through the approval process and promulgation. It is anticipated that after public hearings and the rule review process within the State of Michigan, it would still give over a year for the industry to make the necessary changes. Mr. Bradley Lawrence stated it seems like it is a long time out, but for the industry, financial wise it really is not very much time to make the changes and get it into a company's budget. Mr. Lawrence is concerned that the industry will not have adequate notification. MIOSHA would be sure to communicate the change by all possible means (website, email subscriptions, mailings, etc). Ms. Martha Yoder stated MIOSHA could give some consideration in to going beyond the time frame set on a case by case basis, if we see progress towards changes being made.

### **Committee Recommendation**

A motion was made by Mr. Lawrence and seconded by Mr. Koury to approve the language change as proposed.

### **Committee Member Discussion**

Mr. Koury inquired on if we could use the SPI to help in assisting MIOSHA to get the word out on the changes coming. He suggests we use the SPI as they know who the members are, and they could do bulletins. The changes would go out to those outside Michigan, but it may get more input on if this is a good change. It is believed that utilizing the SPI could get the information out to millions of people across the industry. Mr. Sumpter recommended we check with the Society of Plastic Engineers (SPE) to see if they could help MIOSHA to get the information out to the industry as well. Dr. Rocskay stated MIOSHA does have a list of employers in Michigan that are primary molding companies that we could send letters to, unfortunately it would not cover all that use the plastic molding machines, but it would cover a majority of users. Mr. Koury reminded that if MIOSHA sends out letter, we need to make sure it is addressed to the “right” people, not a secretary who may not get it to the right person. Dr. Rocskay pointed out the GovDelivery/ListServ would go out to those who have signed up for the updates, so it should be going to those that would be in the position to ensure the information is shared and put to use. Ms. Yoder asked if committee members had any recommendations of organizations MIOSHA could utilize to help get the information out to the public. Mr. Pickelman asked that if the committee members have any additional sources beyond the ones mentioned, please be sure to let MIOSHA know. Mr. Andrew Comai recommended trying to utilize the ANSI committees on light curtains and safety control circuitry. Mr. Comai stated they have machines that are about 10 years old that the safety control circuitry and light curtains were redone at the cost of approximately \$1000 a machine.

With no further discussion, Mr. Dykstra called to issue to a vote. **MOTION CARRIED UNANIMOUSLY.**

### **Public Appearance Requests**

None

### **Public Comment**

None

### **Adjournment**

With no further business before the advisory committee, the meeting was adjourned at 9:53am.